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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SIERRA CLUB, a non-profit California
corporation, et al.,

Plaintiffs,

v.

ROGERS C. B. MORTON, individually and
as Secretary of the Interior of the
United States, et al.,

Defendants.

Civil No. 51464 WTS
PLAINTIFF JEAN KOCH'S
ANSWERS TO
INTERROGATORIES

Question:

1. What are the business and residential addresses
of the following named plaintiffs?

(f) Jean Koch

Answer:

Business: No business address

Residential: 6334 West 80th Street
Los Angeles, California 90045

Question:

2. As to each of the foregoing plaintiffs named
in Interrogatory No. 1 above, please state the following:

(a) The address and location of their summer
residence in the Mineral King Valley.

1 (b) The time periods which said plaintiffs occupied
2 their summer residence in the Mineral King Valley.

3 (c) The nature of their legal right by which they
4 occupy the said summer residences:

5 (1) If by grant deed, please state the deed
6 date, book volume, page number and date and place of recording.

7 (2) If occupancy is by lease, please state the
8 date of and term of the original lease as well as any assignments
9 and/or renewals thereof.

10 Answer:

11 (a) Lot No. 10
12 West Mineral King Tract

13 (b) Summer months since purchase in 1958;
14 various weekends in spring and fall.

15 (c) Lease, original dated May 28, 1958, for a
16 20-year term; second lease signed March 23,
17 1967, terminated January 1, 1972; present
18 lease is Terminable Special Use to terminate
19 December 31, 1976.

20 Question:

21 3. What are the names and addresses of all the
22 members of plaintiff, Mineral King District Association?

23 Answer:

24 Not applicable.

25 Question:

26 4. What is the address of plaintiff, Mineral King
27 District Association?

28 Answer:

29 Not applicable.

30 Question:

31 5. What is the date of the formation of plaintiff,
32 Mineral King District Association?

Answer:

1 Not applicable.

2 Question:

3 6. Please state the names of the officers and/or
4 the directors of the Mineral King District Association.

5 Answer:

6 Not applicable.

7 Question:

8 7. Please list the location and address and owner
9 of each of the cabins in the Mineral King Valley and vicinity
10 owned by the members of plaintiff, Mineral King District
11 Association.

12 Answer:

13 Not applicable.

14 Question:

15 8. Please state the total number of dues paying
16 members of plaintiff, Sierra Club.

17 Answer:

18 Not applicable.

19 Question:

20 9. Please state the total number of dues paying
21 members of plaintiff, Sierra Club, who reside in California.

22 Answer:

23 Not applicable.

24 Question:

25 10. Please state the total number of dues paying
26 members of plaintiff, Sierra Club, who reside in the Mineral
27 King Valley.

28 Answer:

29 Not applicable.

30 Question:

31 11. Please state the dates, number of members and
32 precise nature and location of each activity conducted and/or

1 sponsored by plaintiffs in the Mineral King area for the past
2 fifteen (15) years.

3 Answer:

4 I have occupied the cabin at Mineral King at various
5 times, spring through summer each year since 1958, and have
6 engaged in back pack trips and pack trips to various parts
7 of the surrounding country from that base since 1961.

8 Question:

9 12. What are the names, business and residential
10 addresses of the officers and directors of plaintiff, Sierra
11 Club?

12 Answer:

13 Not applicable.

14 Question:

15 13. Have plaintiffs retained, contracted with or
16 received by gratuity, any wildlife, fish scientific, ecological
17 and environmental consultant, contractor, engineer or anyone
18 else to make a survey, study, investigation and/or report with
19 respect to the Mineral King Valley, including but not
20 limited to the Sequoia National Game Refuge, Sequoia National
21 Park and the proposed recreational development of Walt Disney
22 Productions therein?

23 Answer:

24 No.

25 Question:

26 14. If your answer to Interrogatory No. 13 is in the
27 affirmative, please list the name and address of each person
28 making each said survey, study, investigation and/or report
29 and the nature thereof; the dates of commencement and termin-
30 ation of each said survey, study, investigation and/or report.

31 Answer:

32 Not applicable.

1 Question:

2 15. If the survey, study, investigation and report
3 has been reduced to writing, list its title and the person
4 or persons with addresses who have custody thereof.

5 Answer:

6 Not applicable.

7 Question: *

8 16. Do plaintiffs have, from whatever source, any
9 survey, study, investigation and/or report concerning wildlife,
10 fish, ecology and environment insofar as it or they relate
11 to the Mineral King Valley, Sequoia National Park, Sequoia
12 National Game Refuge?

13 Answer:

14 Yes.

15 Question:

16 17. If your answer to Interrogatory No. 16 is in
17 the affirmative, please list the following as to each said
18 survey, study, investigation and report:

19 (a) The title(s) thereof.

20 (b) The name and address of the person or persons
21 who participated therein.

22 (c) The name and address of the person or persons
23 having custody thereof.

24 Answer:

25 1. (a) Preliminary stream flow data and a location
26 map for streamflow recording gages in the Mineral King area.

27 (b) United States Department of the Interior
28 Geological Survey, Water Resources Division
29 Room W-2235 Federal Building
2800 Cottage Way
Sacramento, California 95825

30 (c) Documents in my possession or
31 attorney, James Moorman.
32 _____

2. (a) "Water Resources Data for California",
Part I, Surface Water Records, Vol. 2, Northern Great Basin
and Central Valley.

(b) Department of Water Resources
3374 East Shields Avenue
Fresno, California 93726

(c) Documents in my possession or attorney,
James Moorman.

3. (a) Quotes from water supply report prepared by Dames and Moore in 1966 for Walt Disney Productions.

(b) Dames and Moore
Earth Sciences

(c) Documents in my possession or attorney,
James Moorman.

4. (a) Trout Catch Study.

(b) Chester M. Hart
Regional Manager
Department of Fish and Game
Region 4
1234 East Shaw Avenue

(c) Fresno, California 93726
Documents in my possession or attorney,
James Moorman.

NOTE: This answer does not include copies of materials received by plaintiffs from defendants.

Jean Koch
JEAN KOCH

STATE OF CALIFORNIA)
)
COUNTY OF Los Angeles) SS.

Subscribed and sworn to before me on November 29
1972.

Ana Rose J. Knight
Notary Public

